

April 19, 2002

Alvarion, Inc.
4293 River Birch Drive
Spring Hill, FL 34607

Honorable Michael Powell
Chairman, FCC
445 12th St SW
Washington, DC 20554

RE: Docket 02-33, Universal Service Obligations- Wireless Service Providers

Dear Chairman:

In Paragraph 79 of the referenced docket, the Commission requests interested parties to supply relevant commentary to be considered in the deliberations regarding changes to how the USF is funded and calculated.

Alvarion is a leading developer and marketer of wireless broadband systems. Hundreds of service providers have deployed our products through the US to provide much-needed broadband access to segments of America with no other broadband options.

These operators are providing critical services without government subsidy. This is well in line with the Commission's own "primary policy goal to encourage ubiquitous availability of broadband to all Americans." The Commission's own provision of unlicensed spectrum band usage has been the driving force in this burgeoning success story and a modern example of the innovative American entrepreneurial spirit at work to meet critical community needs.

If the Commission is indeed in support of technologies and companies that can bring "access equity" to communities throughout America quickly and at little cost, then it will not overburden these small, local operators with USF funding requirements. In fact, the method of USF grants disbursements expressly prevents these same operators access to the funds. This is an anti-competitive transfer of funds from broadband enabling companies to broadband stalling companies at best, and it rewards the monopolistic behavior of local incumbents.

We strongly urge the Commission to consider that the interests of the public are best served by encouraging this new market of wireless broadband providers, not discourage through excessive USF funding requirements with no hope of access to the same.

Respectfully,

Patrick Leary
Wireless Broadband Market Evangelist
Alvarion, Inc.